

FILED

JUL 28 2021

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No.
)
OLUMIDE AKINRINMADE,)
)
Defendant.)

4:21CR00423 RWS/SRW

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, the United States Attorney for the Eastern District of Missouri, and Tracy L. Berry, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate.

As and for its grounds, the Government states as follows:

1. Defendant is charged with Title 18, United States Code, Sections: 1349 (conspiracy to commit mail fraud, wire fraud, and use of an assumed and fictitious name); and 1341 (mail fraud).
2. The underlying conduct has resulted in substantial financial hardship to at least one individual;
3. Defendant has access to foreign bank accounts and has substantial ties outside the United States;
4. The charges could result in the imposition of a significant sentence;
5. Defendant is not lawfully within the United States;

6. If he is convicted, Defendant could be deported from the United States; and
7. Pursuant to Title 18, United States Code, Section 3142(g), detention is appropriate based upon: the weight of the evidence against defendant; the potential sentence if defendant is convicted; economic danger to the community; and risk of flight.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required, and the safety of any other person and the community, and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

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/s/ Tracy L. Berry
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